

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

DAWSON M. ROUSE

**SECOND SUPERSEDING  
INDICTMENT**

Case No. 1:20-cr-107

Violations: 18 U.S.C. §§ 1470, 2251(a),  
2251(e), 2252(a)(2), 2252(b)(1), 2422(b),  
and 2428

**COUNT ONE**

**Attempted Sexual Exploitation of a Child**

The Grand Jury Charges:

From in or about January 2020 to in or about May 2020, in the District of North  
Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade,  
induce, entice, and coerce a minor, namely, E.V., to engage in sexually explicit conduct  
for the purpose of producing visual depictions of such conduct, knowing, and having  
reason to believe, that such visual depictions if produced, as requested, would result in  
their transmission using a means and facility of interstate and foreign commerce,  
specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce E.V., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

**Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, M.G., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOUR

**Transfer of Obscene Materials to a Minor**

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, M.G., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT FIVE

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about March 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.D., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIX

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce R.J., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SEVEN

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about January 2019 to in or about April 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, A.B., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT EIGHT

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

In or about April 2019, in the District of North Dakota,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.B., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).



COUNT NINE

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, M.R., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TEN

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce M.R., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT ELEVEN

**Transfer of Obscene Materials to a Minor**

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, M.R., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT TWELVE

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about February 2018 to in or about June 2018, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, B.T., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTEEN

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about January 2019 to in or about December 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, L.W., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOURTEEN

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about January 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce L.W., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIFTEEN

**Transfer of Obscene Materials to a Minor**

The Grand Jury Further Charges:

From in or about January 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, L.W., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT SIXTEEN

**Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, J.T., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



COUNT SEVENTEEN

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly persuade, induce, entice, and coerce J.T., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT EIGHTEEN

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about January 2020 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, C.L., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT NINETEEN

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about January 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce C.L., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY

**Transfer of Obscene Materials to a Minor**

The Grand Jury Further Charges:

From in or about January 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, C.L., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT TWENTY-ONE

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, D.B., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-TWO

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce D.B., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-THREE

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about September 2018 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, G.L., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-FOUR

**Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about February 2019 to in or about May 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, K.B., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



COUNT TWENTY-FIVE

**Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about January 2018 to in or about December 2018, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, C.S., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-SIX

**Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about March 2020 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, P.V., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-SEVEN

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about March 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce P.V., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-EIGHT

**Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of M.G. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWENTY-NINE

**Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of M.R. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY

**Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of D.B. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-ONE

**Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about February 2019 to in or about May 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of K.B. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-TWO

**Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about January 2018 to in or about December 2018, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of C.S. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).



COUNT THIRTY-THREE

**Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about March 2020 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of P.V. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-FOUR

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about April 2019 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, A.S., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTY-FIVE

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about April 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.S., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-SIX

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

In or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, A.J.M., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTY-SEVEN

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

In or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.J.M., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-EIGHT

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about June 2019 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, R.P., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTY-NINE

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about June 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce R.P., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FORTY

**Transfer of Obscene Materials to a Minor**

The Grand Jury Further Charges:

From in or about June 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, R.P., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.



COUNT FORTY-ONE

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about July 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.J., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FORTY-TWO

**Attempted Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about July 2019 to in or about September 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of A.J. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FORTY-THREE

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about April 2019 to in or about June 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, S.S., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY-FOUR

**Attempted Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about April 2019 to in or about June 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of S.S. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FORTY-FIVE

**Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity**

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce E.A., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FORTY-SIX

**Attempted Receipt of Images Depicting the Sexual Exploitation of Children**

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of E.A. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FORTY-SEVEN

**Transfer of Obscene Materials to a Minor**

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, E.A., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT FORTY-EIGHT

**Attempted Sexual Exploitation of a Child**

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, E.A., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2422(b), as charged in this Superseding Indictment,

DAWSON M. ROUSE

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof, and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One iPhone XS; Serial number G0NXN3A4KPFX.

By virtue of commission of the felony offense as charged in this Superseding Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 2428.

A TRUE BILL:

/s/ Foreperson  
Foreperson

/s/ Drew H. Wrigley  
DREW H. WRIGLEY  
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GLD:tmg